BHGL Ref. No. 10022/350

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application:

      Elizabeth DeSchryver et al.

Serial No.:   10/634,250

Filed: August 5, 2003

For: METHODOLOGY FRAMEWORK AND
       DELIVERY VEHICLE

Examiner: Padmanabhan, Kavita

Group Art Unit: 2161

Confirmation No.: 7779

APPEAL BRIEF

Mail Stop Appeal Brief – Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sirs:

    This Appeal Brief is filed based on the Final Rejection of all pending claims mailed on September 10, 2009

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I.   Real Party in Interest

The real party in interest for the above-referenced application is Accenture Global Services GmbH, Geschaftshaus Herrenacker 15, 8200 Schaffhausen, Switzerland. *See* Reel/Frame 014381/0568.

II.   Related Appeals and Interferences

The undersigned is unaware of any other appeals or interferences that will directly affect, be directly affected by or have any bearing on the Board's decision in the pending appeal.

III.   Status of Claims

Claims 1-5 and 9-12 are cancelled and claims 18-21 are withdrawn. Claims 6-8, 13-17 and 22-25 are pending and stand finally rejected.

All of finally rejected claims 6-8, 13-17 and 22-25 are appealed.

IV.   Status of Amendments

No amendments to the claims were filed subsequent to the Final Rejection dated with the response dated September 10, 2009.

V.   Summary of Claimed Subject Matter

Independent claim 6 recites a method for mapping a knowledge base into a hierarchical framework to facilitate reusability of task objects between related work domains. (See e.g., p. 3, ll. 20-23.) A set of taxonomies are defined which comprise members of a universe of activity objects for a first methodology. (See e.g., p. 3, ll. 23-25; p. 6, ll. 25-27.) A set of task objects of singular granularity are organized into object groups having in common a relation to one member of the taxonomy. (See e.g., p. 3, ll. 25-26; p. 16, ll. 25-26.) A plurality of documents having a hierarchical linkage are published onto an application server for access by a user through an electronic display. (See e.g., p. 3, 27-28; p. 20, ll. 5-6; Figs. 5-7.) The highest level document displays the set of taxonomies with links to a set of second level documents. (See e.g., p. 3, ll. 29-30; Figs. 5-7.) Each second level document represents an activity object instantiating a single member of the taxonomy. (See e.g. p. 3, ln. 30 – p. 4, ln. 1; Figs. 5-7.) The

second level document has links to a group of third level documents. (See e.g., p. 4, ll. 1-2; Figs. 5-7.) Each third level document represents a task objects instantiating a single task object of singular granularity. (See e.g., p. 4, ll. 2-4; Figs. 5-7.) A methodology mapping selection for a plurality of methodologies, including the first methodology and a second methodology, is received from the user through the electronic display. (See e.g., p. 3, ll. 27-28.) Each methodology of the plurality of methodologies is mapped to a selection of a set of taxonomies from the user, where an instantiation of an activity object from the first methodology may be reused for the second methodology. (See e.g., p. 4, ll. 4-6.)

VI.   Grounds of Rejection to be Reviewed on Appeal

1. Whether claims 6-8 under 35 U.S.C. § 103(a) are unpatentable over Leymann (U.S. Pub. No. 2002/0026297).

2. Whether claims 13-17 and 22-25 under 35 U.S.C. § 103(a) are unpatentable over Leymann (U.S. Pub. No. 2002/0026297) in view of Pronsati (U.S. Pat. No. 6,678,716).

VII.   Argument

1. Claims 6-8 under 35 U.S.C. § 103(a) over Leymann

Appellant submits that the pending rejections fail to cite references teaching, or suggesting, all of the claimed features. The present Office Action does not correctly address missing elements of the claims. Appellant sets forth missing elements below.

Independent claim 6

Pending Independent claim 6 recites "publishing onto an application server for access by a user through an electronic display a plurality of documents having a hierarchical linkage" where "a highest level document displays the set of taxonomies with links to a set of second level documents," "each second level document representing an activity object instantiating a single member of the taxonomy, the second level document having links to a group of third-level documents," "each third level document representing a task objects instantiating a single task object of singular

granularity," "receiving from the user, through the electronic display," and "a selection of a set of taxonomies from the user."

Leymann generally relates to "automatically deriving … a taxonomy scheme of application services." Leymann, ¶11. Leymann discloses a taxonomy scheme consists of "preexisting categories, sometimes called topics or themes," where each theme can be assigned "access references," such as URLs, which provide access to application services when selected. Leymann, ¶72, ¶84. Thus, Leymann discloses a taxonomy comprised of two items: categories, which are topics or themes (and do not include URLs or links), and access references (URLs), which provide access to an external application service. However, Leymann fails to disclose "a plurality of documents having a hierarchical linkage" where "a highest level document displays the set of taxonomies with links to a set of second level documents," "each second level document representing an activity object instantiating a single member of the taxonomy, the second level document having links to a group of third-level documents," and "each third level document representing a task objects instantiating a single task object of singular granularity," as recited in independent claim 6. Since the taxonomy in Leymann only comprises two items, only one of which includes links (which are links to an external application service), Leymann fails to disclose: 1) a three level hierarchy including 2) distinct items on each of the three levels (set of taxonomies, activity objects, task objects), where, 3) two of the levels include links, and 4) the links of each level link to the next lower level, not to an external application service. While Leymann discloses "subprocess models" which result in a "cross reference" to an application service already included in the taxonomy, the "cross reference" does not link to a next lower level in a hierarchy. Leymann, ¶88.

Leymann further discloses that the taxonomy of Fig. 3B "comprises for instance a subtree represented by the category '[b]oat', comprising the further categories 'Order', 'Price', 'Repair…. FIG. 3B continues the example of FIG. 3A by already comprising certain access references to application services.'" Leymann, ¶86. Thus, Leymann discloses a taxonomy scheme which contains categories and access references to application services. However, Leymann fails to disclose that the taxonomy is published to an application server. Regardless, the taxonomy scheme only includes

categories and access references, neither of which are "a plurality of documents having a hierarchical linkage," as recited in independent claim 6. Thus, Leymann further fails to disclose "publishing onto an application server … a plurality of documents having a hierarchical linkage," as recited in independent claim 6.

Lastly, Leymann discloses an "automatic method of generating taxonomies" which is meant to solve "difficulties" of a "manual approach." Leymann, ¶9. Thus, the system in Leymann is designed to run without user input and therefore fails to disclose any mechanism for displaying a plurality of documents to a user or any mechanism for receiving input from a user. Thus, Leymann fails to disclose "access by a user through an electronic display," "receiving from the user, through the electronic display," and "a selection of a set of taxonomies from the user," as recited in independent claim 6.

For at least these reasons, Appellant respectfully requests review of the final rejection directed against the current application and withdrawal of the rejections against independent claim 6 under Leymann. Claims 7-8 depend from claim 6 and are submitted to be allowable for at least the same reasons.

2. Claims 13-17 and 22-25 under 35 U.S.C. § 103(a) over Leymann in view of Pronsati

Claims 13-17 and 22-25 depend from independent claim 6. Pending Independent claim 6 recites "publishing onto an application server for access by a user through an electronic display a plurality of documents having a hierarchical linkage" where "a highest level document displays the set of taxonomies with links to a set of second level documents," "each second level document representing an activity object instantiating a single member of the taxonomy, the second level document having links to a group of third-level documents," and "each third level document representing a task objects instantiating a single task object of singular granularity."

As previously mentioned, Leymann fails to disclose "publishing onto an application server for access by a user through an electronic display a plurality of documents having a hierarchical linkage" where "a highest level document displays the set of taxonomies with links to a set of second level documents," "each second level document representing an activity object instantiating a single member of the taxonomy, the second level document having links to a group of third-level documents," and "each

third level document representing a task objects instantiating a single task object of singular granularity," as recited in independent claim 6. Pronsati fails to fill the gaps.

Pronsati generally relates to a "process management system" which "includes task information indicative of tasks that define process steps." Pronsati, col. 2, ll. 36-38. Pronsati discloses, "a hierarchical tree arrangement of tasks," the tasks being information "defined by the task information 21." Pronsati, col. 4, ll. 47-51. Thus, Pronsati discloses a hierarchy comprised of one item, tasks, and the tasks are information, not links. Pronsati fails to disclose "a plurality of documents having a hierarchical linkage" where "a highest level document displays the set of taxonomies with links to a set of second level documents," "each second level document representing an activity object instantiating a single member of the taxonomy, the second level document having links to a group of third-level documents," and "each third level document representing a task objects instantiating a single task object of singular granularity," as recited in independent claim 6. Since the hierarchy in Pronsati only includes one item, and the item does not include links, Pronsati fails to disclose: 1) a three level hierarchy including 2) a distinct item on each of the three levels (set of taxonomies, activity objects, task objects), where, 3) two of the levels include links, and 4) the links of each level link to the next lower level.

Leymann and Pronsati, alone or in combination, fail to teach or suggest all of the elements of independent claim 6, which dependent claims 13-17 and 22-25 depend on. For at least this reason, Appellant respectfully requests review of the final rejection directed against the current application and withdrawal of the rejections against claims 13-17 and 22-25 under Leymann and Pronsati.

Arguments of the Advisory Action

The Advisory Action states, "Leyman [sic] clearly depicts and describes a hierarchical structure that includes at least 3 levels (par [0009]; Fig. 3B) and a first level displays taxonomies, the second level displays activities, and the third level represents a task (for example boat-order-url to instantiate the order, as depicted in Fig. 3B and described at par [0086]." Advisory Action, p. 2. In regards to Fig. 3A and Fig. 3B, Leymann discloses, "a taxonomy as shown in Fig. 3A is given…taxonomy is empty with respect to application services…[s]uch a taxonomy scheme can be predefined or may

be generated by a further embodiment of the current invention … Fig. 3B continues the example of Fig. 3A by already comprising certain access references to application services." Leymann, ¶86. Thus, in Leymann Fig. 3B, as a whole, shows a taxonomy; the first level of Fig. 3B does not display a taxonomy. In regards to Fig. 3B, Leymann further discloses, "the category '[b]oat', comprising the further categories 'Order', 'Price', 'Repair.'" Leymann, ¶86. Thus, Fig. 3B shows a taxonomy scheme which contains categories and access references to application services. However, Leymann fails to disclose "a plurality of documents having a hierarchical linkage" where "a highest level document displays the set of taxonomies with links to a set of second level documents," "each second level document representing an activity object instantiating a single member of the taxonomy, the second level document having links to a group of third-level documents," and "each third level document representing a task objects instantiating a single task object of singular granularity," as recited in independent claim 6.

The Advisory Action further states, "the Examiner respectfully asserts that the claims do not claim publishing all the documents onto a single server." Advisory Action, p. 2. Pending independent claim 6 recites, 'publishing onto an application server … a plurality of documents having a hierarchical linkage." Leymann discloses that the taxonomy of Fig. 3B "comprises for instance a subtree represented by the category '[b]oat', comprising the further categories 'Order', 'Price', 'Repair…. FIG. 3B continues the example of FIG. 3A by already comprising certain access references to application services.'" Leymann, ¶86. Thus, Leymann discloses a taxonomy scheme which contains categories and access references to application services. However, Leymann fails to disclose that the taxonomy is published to an application server. Regardless, the taxonomy scheme only includes categories and access references, neither of which are "a plurality of documents having a hierarchical linkage," as recited in independent claim 6. Thus, Leymann further fails to disclose "publishing onto an application server … a plurality of documents having a hierarchical linkage," as recited in independent claim 6.

Lastly, the Advisory Action states, "Leymann clearly teaches providing the user with the hierarchical scheme and allowing the user to navigate the hierarchy (claim 1,

last limitation)." Advisory Action, p. 2. In Leymann, the last limitation of claim 1 states, "enabling a user to navigate within said taxonomy scheme." Leymann, claim 1. However, Leymann fails to disclose any mechanism for displaying a plurality of documents to a user or any mechanism for receiving input from a user, such as an electronic display. Thus, Leymann fails to disclose "access by a user through an electronic display," and "receiving from the user, through the electronic display," as recited in independent claim 6. Furthermore, enabling a user to navigate within a taxonomy scheme does not disclose "a selection of a set of taxonomies," as recited in independent claim 6.

CONCLUSION

For the reasons provided above, Appellant submits that claims 6-8, 13-17 and 22-25 are allowable over the cited art. Appellant respectfully submits that the outstanding rejections of the claims as unpatentable are in error and should be reversed.

Respectfully submitted,

February 9, 2010 _____
Date

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VIII.   Claims Appendix

1. (Cancelled)

2. (Cancelled)

3. (Cancelled)

4. (Cancelled)

5. (Cancelled)

6. A method for mapping a knowledge base into a hierarchical framework to facilitate reusability of task objects between related work domains, the method comprising:

defining a set of taxonomies comprising members of a universe of activity objects for a first methodology;

organizing a set of task objects of singular granularity into object groups having in common a relation to one member of the taxonomy; and

publishing onto an application server for access by a user through an electronic display a plurality of documents having a hierarchical linkage, wherein a highest level document displays the set of taxonomies with links to a set of second level documents, each second level document representing an activity object instantiating a single member of the taxonomy, the second level document having links to a group of third-level documents, each third level document representing a task objects instantiating a single task object of singular granularity;

receiving from the user, through the electronic display, a methodology mapping selection for a plurality of methodologies, including the first methodology and a second methodology; and

mapping, with the methodology mapping selection, each methodology of the plurality of methodologies to a selection of a set of taxonomies from the user, whereby an instantiation of an activity object from the first methodology may be reused for the second methodology.

7. The method of claim 6, wherein the activity objects are established by defining a first set of taxonomies sharing in common a first characteristic inherent to each member in the first set of taxonomies; and defining a second set of taxonomies sharing in common a second characteristic inherent to each member in the second set of taxonomies; the first set of characteristics being independent of the second set of characteristics; and associating with an activity object one member of the first set of taxonomies and one member of the second set of taxonomies.

8. The method of claim 7, wherein the first characteristic is a time sequence, and the second characteristic is a skill set.

9. (Cancelled)

10. (Cancelled)

11. (Cancelled)

12. (Cancelled)

13. The method of claim 6, wherein the activity objects correspond to activities that describe a process of one of the methodologies, wherein each activity object includes role information that identifies skill sets needed to complete a task for the activity; wherein the task objects corresponds to tasks that describe each activity; and wherein a set of steps describe each task.

14. The method of claim 13, wherein the activities include: Human Resources, Unit Management, Finance and Reporting, Performance Measurement, Process and Quality Management, Service Management, Technology Enablement, and Facilities and Equipment.

15. The method of claim 13, wherein the activities include: analyzing, designing, building and testing application.

16. The method of claim 6, wherein the activities correspond to a group of processes that are usually performed by a team of people with related skill sets, the group of processes including: project management, application, content, technical architecture, training and performance support, business process, organization, facilities and equipment, and service introduction;

wherein for each of the group of processes at least one activity corresponds to one of the group comprising: analyzing, designing, building, and testing; and

wherein the task objects of singular granularity comprise a single outcome.

17. The method of claim 16, wherein one object group is associated with planning the implementation of an application development project for one of the methodologies, and defining a set of tasks for deploying the application development project.

18. (Withdrawn) The method of claim 6, wherein the hierarchical linkage corresponds to presenting the methodology in three levels of hierarchically-related displays comprising a first level display, a plurality of second level displays and a plurality of third level displays, wherein

the first level display consists of a single page comprising a planning chart, the planning chart depicting a plurality of stages and a plurality of workstreams arranged in an orthogonal relationship forming intersections on the planning chart, wherein a user-selectable links is provided at an intersection to provide access to the second level display comprising information related to an activity corresponding intersected stage and workstream;

the second level display comprising an activity chart depicting a process of related tasks comprising the activity, wherein a user-selectable link is provided within the depiction of a task to provide access to the third level display comprising information related to the linked task; and

the third level display comprising a task chart depicting one or more steps for completing the task and a user-selectable link to a sample deliverable document associated with the task.

19. (Withdrawn) The method of claim 18, wherein the activity chart depicts the tasks pictorially.

20. (Withdrawn) The method of claim 18, wherein the activity chart depicts the tasks in a list.

21. (Withdrawn) The method of claim 18, wherein the third level display depicts the tasks pictorially.

22. The method of claim 6, where the highest level document represents one of the methodologies mapped to one of the selections of a set of taxonomies; where each of the second level documents are activity documents that identify activity objects for one of the respective taxonomies from the set of taxonomies; and where each of the

third level documents are task documents that identify task objects for one of the activity documents.

23. The method of claim 22, where each of the activity documents include an activity planning chart that contains graphically depicted tasks for the task objects.

24. The method of claim 23, where each of the activity documents employ colors to designate the roles for the tasks associated with the activities objects.

25. The method of claim 22, where each of the task documents include: a task planning chart that contains process steps for each of the tasks; and a list of the principle objectives and outcomes for each of the tasks.

IX.   Evidence Appendix

None

X.   Related Proceedings Appendix

None